

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 23-cr-20394

v.

Hon. Sean F. Cox  
Chief United States District Judge

ISAAC YOUNG,

Defendant.

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ORDER BASED ON STIPULATION

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With the agreement of all the parties, and Court enters the following Order:

STIPULATION BY PARTIES

1. Any materials designated by the Government as Attorney Only Discovery will be subject to the terms of this Order. The government will prominently mark any Attorney Only discovery as such.
2. If counsel for Defendant believes that any material is not properly designated as Attorney Only Discovery, he shall raise that issue with the United States. If the parties are unable to agree on the status of a given item of discovery, the Defendant may seek leave of the Court to de-designate the item. However, all items designated as Attorney Only Discovery must be treated as such until de-

designated by the government or the Court.

3. The persons who may receive and review Attorney Only Discovery, and will be referred to as “Covered Individuals”, are:

- a. Attorney(s) of record for the Defendant;
- b. Persons employed, or who have been contracted to work on this case, by defense counsel who are assisting with the preparation of Defendant’s defenses;
- c. Any expert(s) retained on behalf of Defendant to assist in the defense of this matter;
- d. Any investigator(s) retained on behalf of Defendant to assist in the defense of this matter.

4. Attorney Only Discovery provided by the government shall not be disclosed by the defense to any person except Covered Individuals.

5. Attorney Only Discovery may be reviewed with, or described to, Defendant, but Defendant shall not be given copies of such material, unless the Attorney Only Discovery is later removed from the terms of the protective order by the government or by Court order.

6. Information contained in the Attorney Only discovery shall not be disseminated or provided to anyone other than Covered Persons in any form or by any means.

7. Prior to any Covered Individual receiving access to the Attorney Only Discovery pursuant to this Order, the Covered Individual shall sign a copy of this order acknowledging that:

- a. They have reviewed the Order;
- b. They understand all its contents;
- c. They agree that they will only access the Attorney Only Discovery for the purposes of preparing a defense for Defendant;
- d. They understand that failure to abide by this Order may result in sanctions by this Court and criminal charges for contempt.

8. No person other than Covered Individuals may be allowed to examine Attorney Only Discovery, absent further court order. Attorney Only Discovery will be maintained in a secure environment which is reasonably certain to not expose the materials to individuals not listed above.

9. Neither the Government nor the defense shall offer or file any Attorney Only Discovery unless such Attorney Only Discovery (1) is offered or filed under seal, (2) is offered or filed with the concurrence of the party that originally produced it, (3) is offered or filed at the trial of this matter, or (4) is offered or filed pursuant to further court order.

10. No copies of Attorney Only Discovery may be provided by counsel to other individuals, absent further court order.

11. This Order is binding on successor counsel, if any, including appellate counsel, and a copy of this order will be transmitted to such successor counsel with the materials protected by this Order, all without prejudice to successor counsel's right to move the Court for an order modifying or vacating this Order. Before Attorney Only Discovery can be turned over to successor counsel, successor counsel must sign a copy of this Order.

SO STIPULATED:

s/ David P. Cowen  
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s/ Robert F. Kinney (with consent)  
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Dated: August 17, 2023

**IT IS SO ORDERED**

Dated: August 21, 2023

s/Sean F. Cox  
Sean F. Cox  
U. S. District Judge